(2)

No. 91-1146

Supreme Court, U.S.
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IN THE

Supreme Court of the United States

OCTOBER TERM, 1991

UNIONAMERICA INSURANCE COMPANY LTD. and CONTINENTAL REINSURANCE CORPORATION (U.K.) LIMITED, et al.,

Petitioners,

– against –

STATE OF CALIFORNIA, et al.,

Respondents.

PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

RESPONSE IN SUPPORT OF PETITION FOR A WRIT OF CERTIORARI

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(For Further Appearances See Reverse Side of Cover)

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STATEMENT PURSUANT TO RULE 29.1

Merrett Underwriting Agency Management Limited is wholly owned by Merrett Holdings PLC.

Three Quays Underwriting Management Limited is wholly owned by Cater Allen Holdings PLC.

Edwards & Payne (Underwriting Agencies) Limited and Sturge Reinsurance Syndicate Management Limited, successor in interest to Oxford Syndicate Management Ltd., are wholly owned by Sturge Group PLC.

No other of these respondents has any parent or subsidiary corporations within the meaning of Rule 29.1 of the Rules of the Supreme Court of the United States.

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Merrett Underwriting Agency Management Limited, Three Quays Underwriting Management Limited, Janson Green Management Limited, Murray Lawrence & Partners, D.P. Mann Underwriting Agency Limited, Robin A.G. Jackson, Peter N. Miller, Edwards & Payne (Underwriting Agencies) Limited, and Sturge Reinsurance Syndicate Management Limited submit this response in support of the *Petition for a Writ of Certiorari* in No. 91-1146, arising out of the decision of the United States Court of Appeals for the Ninth Circuit of *In re Insurance Antitrust Litigation.*

Although they are automatically deemed respondents here, these respondents are identically situated to the petitioners in

No. 91-1146. Like petitioners, these respondents are underwriters who trade in the London reinsurance market and one, Sir Peter N. Miller, is a former Chairman of Lloyd's of London. Like petitioners, these respondents are sued in the claims at issue here for allegedly agreeing to restrict the terms and conditions on which they would write reinsurance and retrocessional reinsurance in the London market.

The petition in No. 91-1146 challenges plaintiffs' antitrust standing to bring the claims at issue. These respondents are situated in exactly the same position vis-a-vis plaintiffs as are petitioners, and all petitioners' arguments on plaintiffs' antitrust standing are shared by these respondents. Respondents therefore support the petition for a writ of certiorari and adopt all of the arguments made therein.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

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